



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

*271 Cadman Plaza East
Brooklyn New York 11201*

November 8, 2021

BY ECF

Honorable Vera M. Scanlon
United States Magistrate Judge
Eastern District of New York
United States Courthouse
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Terkeltaub v. United States of America*
Civil Action No. CV-20-3938

Dear Judge Scanlon:

This is the parties' joint status report on this FTCA medical malpractice case.

As plaintiff has a very complex medical condition with numerous medical providers and hospitals, obtaining the medical records via subpoena is a complex and on-going task. Plaintiffs' depositions have now been completed. The deposition of the treating physician is scheduled for January 24, 2022.

The parties request an adjournment of the present deadlines:

The parties request that the present deadline for completion of all discovery be adjourned from November 30, 2021 to March 25, 2022, the present deadline for dispositive motions be adjourned from December 30, 2021 to February 15, 2022 and the Pre-Trial Order deadline be adjourned from January 15, 2022 to April 30, 2022.

The parties thank the court for its consideration of this request.

Respectfully submitted,

BREON PEACE.
United States Attorney

By: /s/ Kevan Cleary
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cc: **By ECF**

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